

Court of Common Pleas of Philadelphia County
Trial Division
Civil Cover Sheet

		For Prothonotary Use Only (Docket Number)	
PLAINTIFF'S NAME RONALD KELLY		DEFENDANT'S NAME MAXUM SPECIALTY INSURANCE GROUP	
PLAINTIFF'S ADDRESS 518 REVOLUTIONARY WAY WARMINSTER PA 18974		DEFENDANT'S ADDRESS 3655 NORTH POINT PARKWAY SUITE 500 ALPHARATTA GA 30005	
PLAINTIFF'S NAME PATRICE KELLY		DEFENDANT'S NAME THE CARMAN CORPORATION	
PLAINTIFF'S ADDRESS 518 REVOLUTIONARY WAY WARMINSTER PA 18974		DEFENDANT'S ADDRESS 940 W. SPROUL ROAD SUITE 104 SPRINGFIELD PA 19064	
PLAINTIFF'S NAME RONALD KELLY AND PATRICE KELLY , ALIAS: REPRESENTATIVE JOHN BELL		DEFENDANT'S NAME THE CARMAN GROUP, INC.	
PLAINTIFF'S ADDRESS 518 REVOLUTIONARY WAY WARMINSTER PA 18974		DEFENDANT'S ADDRESS 940 W. SPROUL ROAD SUITE 104 WARMINSTER PA 19064	
TOTAL NUMBER OF PLAINTIFFS 3	TOTAL NUMBER OF DEFENDANTS 5	COMMENCEMENT OF ACTION <input checked="" type="checkbox"/> Complaint <input type="checkbox"/> Petition Action <input type="checkbox"/> Notice of Appeal <input type="checkbox"/> Writ of Summons <input type="checkbox"/> Transfer From Other Jurisdictions	
AMOUNT IN CONTROVERSY <input type="checkbox"/> \$50,000.00 or less <input checked="" type="checkbox"/> More than \$50,000.00	COURT PROGRAMS <input type="checkbox"/> Arbitration <input type="checkbox"/> Mass Tort <input type="checkbox"/> Commerce <input type="checkbox"/> Settlement <input checked="" type="checkbox"/> Jury <input type="checkbox"/> Savings Action <input type="checkbox"/> Minor Court Appeal <input type="checkbox"/> Minors <input type="checkbox"/> Non-Jury <input type="checkbox"/> Petition <input type="checkbox"/> Statutory Appeals <input type="checkbox"/> W/D/Survival <input type="checkbox"/> Other:		
CASE TYPE AND CODE 1C - CONTRACTS (GOODS), ENFORCE			
STATUTORY BASIS FOR CAUSE OF ACTION			
RELATED PENDING CASES (LIST BY CASE CAPTION AND DOCKET NUMBER)		IS CASE SUBJECT TO COORDINATION ORDER? YES NO	
		<div style="text-align: center;"> FILED PROPROTHY DEC 01 2014 K. EDWARDS </div>	
TO THE PROTHONOTARY: Kindly enter my appearance on behalf of Plaintiff/Petitioner/Appellant: <u>RONALD KELLY , PATRICE KELLY ,</u> <u>RONALD KELLY AND PATRICE KELLY</u> Papers may be served at the address set forth below.			
NAME OF PLAINTIFF'S/PETITIONER'S/APPELLANT'S ATTORNEY MICHAEL O. PANSINI		ADDRESS PANSINI & MEZROW 1525 LOCUST ST 15TH FLOOR PHILADELPHIA PA 19102	
PHONE NUMBER (215) 732-5555	FAX NUMBER (215) 732-7872		
SUPREME COURT IDENTIFICATION NO. 44455		E-MAIL ADDRESS MPansini@Pansinilaw.com	
SIGNATURE OF FILING ATTORNEY OR PARTY MICHAEL PANSINI		DATE SUBMITTED Monday, December 01, 2014, 11:24 am	

FINAL COPY (Approved by the Prothonotary Clerk)

Case ID: 130704825

Control No.: 14120601

COMPLETE LIST OF DEFENDANTS:

1. SERGIUS B. CARMAN
940 W. SPROUL ROAD SUITE 104
WARMINSTER PA 19064
2. THE CARMAN GROUP, LLC
940 W. SPROUL ROAD SUITE 104
WARMINSTER PA 19064
3. THE CARMAN GROUP, INC.
940 W. SPROUL ROAD SUITE 104
WARMINSTER PA 19064
4. THE CARMAN CORPORATION
940 W. SPROUL ROAD SUITE 104
SPRINGFIELD PA 19064
5. MAXUM SPECIALTY INSURANCE GROUP
3655 NORTH POINT PARKWAY SUITE 500
ALPHARATTA GA 30005

PANSINI & MEZROW
BY: MICHAEL O. PANSINI, ESQUIRE
I.D. #44455
1525 Locust Street, 15th Floor
Philadelphia, PA 19102
(215) 732-5555

THIS IS A MAJOR JURY TRIAL

Filed and Attested by
PROTHONOTARY
01 DEC 2014 11:24 am
K. EDWARDS

ATTORNEY FOR PLAINTIFFS

RONALD KELLY and PATRICE KELLY,
Individually and as h/w
518 Revolutionary Way
Warminster, PA 18974

and

RONALD KELLY and PATRICE KELLY,
as Assignees of BBK TAVERN, INC., d/b/a
THE PRINCETON TAVERN, by and through
its authorized representative, JOHN BELL
518 Revolutionary Way
Warminster, PA 18974

Plaintiffs

v.

MAXUM SPECIALTY INSURANCE GROUP
3655 North Point Parkway
Suite 500
Alpharetta, GA 30005

and

THE CARMAN CORPORATION
940 W. Sproul Road, Suite 104
Springfield, PA 19064

and

THE CARMAN GROUP, INC.
940 W. Sproul Road, Suite 104
Springfield, PA 19064

and

THE CARMAN GROUP, LLC
940 W. Sproul Road, Suite 104
Springfield, PA 19064

and

SERGIUS B. CARMAN
940 W. Sproul Road, Suite 104
Springfield, PA 19064

Defendants

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY

CIVIL ACTION

NO.:

CIVIL ACTION - COMPLAINT - NOTICE TO DEFEND
1C - CONTRACT

YOU HAVE BEEN SUED IN COURT. IF YOU WANT TO DEFEND AGAINST THE CLAIMS SET FORTH IN THE FOLLOWING PAGES, YOU MUST TAKE ACTION WITHIN TWENTY (20) DAYS AFTER THIS COMPLAINT AND NOTICE ARE SERVED, BY ENTERING A WRITTEN APPEARANCE PERSONALLY OR BY AN ATTORNEY AND FILING IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO

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Philadelphia Bar Association
Lawyer Referral and Information Service
One Reading Center
Philadelphia, Pennsylvania 19107
(215) 238-1701

PERSONA. SEA A VISADO QUE SI USTED NO SE DEFIENDE, LA CORTE TOMARA MEDIDAS Y PUEDE CONTINUAR LA DEMANDA EN CONTRA SUYA SIN PREVIO AVISO O NOTIFICACION. ADEMAS, LA CORTE PUEDE DECIDIR A FAVOR DEL DEMANDANTE Y REQUIERE QUE USTED CUMPLA CON TODAS LAS PROVISIONES DE ESTA DEMANDA. USTED PUEDE PERDER DINERO O SUS PROPIEDADES U OTROS DERECHOS IMPORTANTES PARA USTED.

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PANSINI & MEZROW
BY: MICHAEL O. PANSINI, ESQUIRE
I.D. #44455
1525 Locust Street, 15th Floor
Philadelphia, PA 19102
(215) 732-5555

THIS IS A MAJOR JURY TRIAL

ATTORNEY FOR PLAINTIFFS

RONALD KELLY and PATRICE KELLY,
Individually and as h/w
518 Revolutionary Way
Warminster, PA 18974
and
RONALD KELLY and PATRICE KELLY,
as Assignees of BBK TAVERN, INC., d/b/a
THE PRINCETON TAVERN, by and through
its authorized representative, JOHN BELL
518 Revolutionary Way
Warminster, PA 18974

Plaintiffs

v.

MAXUM SPECIALTY INSURANCE GROUP
3655 North Point Parkway
Suite 500
Alpharetta, GA 30005
and
THE CARMAN CORPORATION
940 W. Sproul Road, Suite 104
Springfield, PA 19064

and
THE CARMAN GROUP, INC.
940 W. Sproul Road, Suite 104
Springfield, PA 19064

and
THE CARMAN GROUP, LLC
940 W. Sproul Road, Suite 104
Springfield, PA 19064

and
SERGIUS B. CARMAN
940 W. Sproul Road, Suite 104
Springfield, PA 19064

Defendants

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY

CIVIL ACTION

NO.:

CIVIL ACTION - COMPLAINT - NOTICE TO DEFEND
1C - CONTRACT

1. This is an action for declaratory judgment pursuant to 42 Pa. C S. 7531 et seq. For the purpose of determining a question of actual controversy between the parties as hereinafter more fully appears.

2. Plaintiffs, Ronald and Patrice Kelly, are adult individuals residing at 518 Revolutionary Way, Warminster, PA 18974.

3. Plaintiffs, Ronald Kelly and Patrice Kelly, as Assignees of BBK Tavern, Inc., d/b/a The Princeton Tavern, by and through its authorized representative, John Bell, hereby files this litigation upon a valid and enforceable assignment of rights.

4. Defendant, Maxum Specialty Insurance Group, is a Pennsylvania and/or foreign corporation or business entity with an address at 3655 North Point Parkway, Suite 500, Alpharetta, GA 30005. At all times material hereto, said Defendant regularly and systematically conducted business in Philadelphia County.

5. Defendant, the Carman Corporation, is a Pennsylvania corporation or business entity with an address at 940 W. Sproul Road, Suite 104, Springfield, PA 19064. At all times material hereto, said Defendant regularly and systematically conducted business in Philadelphia County.

6. Defendant, The Carman Group, Inc., is a Pennsylvania corporation or business entity with an address at 940 W. Sproul Road, Suite 104, Springfield, PA 19064. At all times material hereto, said Defendant regularly and systematically conducted business in Philadelphia County.

7. Defendant, The Carman Group, LLC, is a Pennsylvania corporation or business entity with an address at 940 W. Sproul Road, Suite 104, Springfield, PA 19064.

At all times material hereto, said Defendant regularly and systematically conducted business in Philadelphia County.

8. Defendant, Sergius B. Carman, is an adult individual and citizen of the Commonwealth of Pennsylvania, who regularly conducts business at 940 W. Sproul Road, Suite 104, Springfield, PA 19064. At all times material hereto, said Defendant regularly and systematically conducted business in Philadelphia County and/or is amenable to service in Philadelphia County.

9. At all times material hereto, Defendant, Sergius B. Carman, acted within the course and scope of his employment for Defendants, the Carman Corporation, the Carman Group, Inc. and the Carman Group, LLC.

10. At all times material to the pendency of the Ronald and Patrice Kelly, as assignees of BBK Tavern, Inc. v. The Carman Corporation, et. al. (Phila. CCP; July Term, 2013, No. 04825) litigation, Defendants, the Carman Corporation, the Carman Group, Inc. and the Carman Group, LLC. had errors and omissions insurance coverage through Defendant, Maxum Specialty Insurance Group, which was purchased by the Defendants, the Carman Corporation, the Carman Group, Inc. and the Carman Group, LLC.

11. At all times material hereto, Defendant, Maxum Specialty Insurance Group, insured Carman Corporation, the Carman Group, Inc., Sergius B. Carman and the Carman Group, LLC. Pursuant to the policy which insured Carman Corporation, the Carman Group, Inc., Sergius B. Carman and the Carman Group, LLC for errors and omissions, the insurance applies to errors and omissions if same is caused by an occurrence.

12. The Ronald and Patrice Kelly, as assignees of BBK Tavern, Inc. v. The

Carman Corporation, et. al. (Phila. CCP; July Term, 2013, No. 04825) litigation is a pending matter. See amended complaint and dockets attached as Exhibits "A" and "B" respectively.

13. The allegations and claims for relief in the underlying lawsuit, Ronald and Patrice Kelly, as assignees of BBK Tavern, Inc. v. The Carman Corporation, et. al. (Phila. CCP; July Term, 2013, No. 04825), allege an occurrence under the terms of the insurance policy, and, accordingly, trigger coverage on the part of the Defendant, Maxum Specialty Insurance Group.

14. Plaintiffs have an interest which is direct, substantial, and immediate, and there exists a real or actual controversy.

15. Plaintiffs, Ronald and Patrice Kelly, hereby bring this action seeking declaratory judgment to obtain an adjudication that Defendant, Maxum Specialty Insurance Group, is obligated to provide a defense and indemnification to its insureds, the Carman Corporation, the Carman Group, Inc., Sergius B. Carman and the Carman Group, LLC., under and pursuant to the coverages of policy in full force and effect at all times material hereto in the Ronald and Patrice Kelly, as assignees of BBK Tavern, Inc. v. The Carman Corporation, et. al. (Phila. CCP; July Term, 2013, No. 04825) litigation.

16. The insurance coverage through Defendant, Maxum Specialty Insurance Group, applies and covers the Defendants, the Carman Corporation, the Carman Group, Inc., Sergius B. Carman and the Carman Group, LLC., in the Ronald and Patrice Kelly, as assignees of BBK Tavern, Inc. v. The Carman Corporation, et. al. Phila. CCP; July Term, 2013, No. 04825 litigation for indemnity and defense of Carman Corporation, the Carman Group, Inc., Sergius B. Carman and the Carman Group, LLC.

WHEREFORE, Plaintiffs, Ronald and Patrice Kelly, request that this Honorable Court enter judgment in favor of the Plaintiffs and declare as follows:

1. Defendant, Maxum Specialty Insurance Group, is obligated to defend its insureds, the Carman Corporation, the Carman Group, Inc., Sergius B. Carman and the Carman Group, LLC., in the underlying Ronald and Patrice Kelly, as assignees of BBK Tavern, Inc. v. The Carman Corporation, et. al. (Phila. CCP; July Term, 2013, No. 04825) litigation;
2. Defendant, Maxum Specialty Insurance Group, is obligated to indemnify its insureds, the Carman Corporation, the Carman Group, Inc., Sergius B. Carman and the Carman Group, LLC., in the underlying Ronald and Patrice Kelly, as assignees of BBK Tavern, Inc. v. The Carman Corporation, et. al. (Phila. CCP; July Term, 2013, No. 04825) litigation;
3. Defendant, Maxum Specialty Insurance Group, is obligated to reimburse counsel for Plaintiffs, Ronald and Patrice Kelly, for all their attorney's fees and costs they have or will incur in the litigation of this coverage litigation;
4. Grant such other and further relief as may be proper.

Respectfully Submitted,

PANSINI & MEZROW

**BY: /s/ Michael O. Pansini
Michael O. Pansini, Esquire
1525 Locust Street, 15th Floor
Philadelphia, PA 19102
(215) 732-5555
Attorney for Plaintiffs,
Ronald and Patrice Kelly
As Assignees of BBK Tavern, Inc.**

Date: December 1, 2014



Exhibit "A"

PANSINI & MEZROW
BY: MICHAEL O. PANSINI, ESQUIRE
I.D. #44455
1525 Locust Street, 15th Floor
Philadelphia, PA 19102
(215) 732-5555

THIS IS A MAJOR JURY TRIAL

Filed and Attested by
PROTHONOTARY
09 JAN 2014 12:03 pm

ATTORNEY FOR PLAINTIFFS

RONALD KELLY and PATRICE KELLY,
Individually and as h/w
518 Revolutionary Way
Warminster, PA 18974
and
RONALD KELLY and PATRICE KELLY,
as Assignees of BBK TAVERN, INC., d/b/a
THE PRINCETON TAVERN, by and through
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Plaintiffs

v.

THE CARMAN CORPORATION
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and
THE CARMAN GROUP, INC.
940 W. Sproul Road, Suite 103
Springfield, PA 19064
and
THE CARMAN GROUP, LLC
940 W. Sproul Road, Suite 103
Springfield, PA 19064
and
SERGIUS B. CARMAN
940 W. Sproul Road, Suite 103
Springfield, PA 19064

Defendants

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY

CIVIL ACTION

JULY TERM, 2013

NO.: 4825

CIVIL ACTION - AMENDED COMPLAINT - NOTICE TO DEFEND
20 PERSONAL INJURY OTHER AND TORT, 1C - CONTRACT

YOU HAVE BEEN SUED IN COURT. IF YOU WISH TO DEFEND AGAINST THE CLAIMS SET FORTH IN THE FOLLOWING PAGES, YOU MUST TAKE ACTION WITHIN TWENTY (20) DAYS AFTER THIS COMPLAINT AND NOTICE ARE SERVED, BY ENTERING A WRITTEN APPEARANCE PERSONALLY OR BY AN ATTORNEY AND FILING IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO

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Case ID: 130704825

Case ID: 141200233

Case ID: 130704825

Control No.: 14120601

THE CLAIMS SET FORTH AGAINST YOU. YOU ARE WARNED THAT IF YOU FAIL TO DO SO THE CASE MAY PROCEED WITHOUT YOU AND A JUDGMENT MAY BE ENTERED AGAINST YOU BY THE COURT WITHOUT FURTHER NOTICE FOR ANY MONEY CLAIMED OR FOR ANY OTHER CLAIM OR RELIEF REQUESTED BY THE PLAINTIFF. YOU MAY LOSE MONEY OR PROPERTY OR OTHER RIGHTS IMPORTANT TO YOU.

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Servicio de Referencia e Información Legal
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Filadelfia, Pennsylvania 19107
(215) 238-1701

1. Plaintiff, **RONALD KELLY**, is an adult individual residing at 518 Revolutionary Way, Warminster, PA 18974.
2. Plaintiff, **PATRICE KELLY**, is an adult individual residing at 518 Revolutionary Way, Warminster, PA 18974.
3. Plaintiffs, Ronald Kelly and Patrice Kelly, as Assignees of BBK Tavern, Inc., d/b/a The Princeton Tavern, by and through its authorized representative, John Bell, hereby files this litigation upon a valid and enforceable assignment of rights.
4. Defendant, **THE CARMAN CORPORATION**, is a Pennsylvania corporation or business entity with an address at 940 W. Sproul Road, Suite 103, Springfield, PA 19064. At all times material hereto, said Defendant regularly and systematically conducted business in Philadelphia County.
5. Defendant, **THE CARMAN GROUP, INC.**, is a Pennsylvania corporation or business entity with an address at 940 W. Sproul Road, Suite 103, Springfield, PA 19064. At all times material hereto, said Defendant regularly and systematically conducted business in Philadelphia County.
6. Defendant, **THE CARMAN GROUP, LLC**, is a Pennsylvania corporation or business entity with an address at 940 W. Sproul Road, Suite 103, Springfield, PA 19064.

Case ID: 130704825

Case ID: 141200233

Case ID: 130704825

Control No.: 14120601

At all times material hereto, said Defendant regularly and systematically conducted business in Philadelphia County.

7. Defendant, **SERGIUS B. CARMAN**, is an adult individual and citizen of the Commonwealth of Pennsylvania, who readily conducts business at 940 W. Sproul Road, Suite 103, Springfield, PA 19064. At all times material hereto, said Defendant regularly and systematically conducted business in Philadelphia County.

8. At all times material hereto, Defendant, **SERGIUS B. CARMAN**, acted within the course and scope of his employment with Defendants, **THE CARMAN CORPORATION, THE CARMAN GROUP, INC.** and **THE CARMAN GROUP, LLC**.

9. At all times material hereto, BBK Tavern, Inc., d/b/a The Princeton Tavern had a business address at 7101 Rising Sun Avenue, Philadelphia, PA 19111 where it was in the business of operating a bar which served alcoholic beverages.

10. At all times material hereto, the Defendants acted as an insurance broker for BBK Tavern, Inc., d/b/a The Princeton Tavern, by and through its authorized representative, John Bell and sold and wrote BBK Tavern, Inc., d/b/a The Princeton Tavern insurance coverage, including dram shop coverage for the bar located at 7101 Rising Sun Avenue, Philadelphia, PA 19111.

11. At all times material hereto, the Defendants held themselves out as having expertise as insurance brokers and held themselves out as competent and qualified to process insurance claims.

12. Pertinent to the instant litigation, the assignor, BBK Tavern, Inc., d/b/a The Princeton Tavern, by and through its authorized representative, John Bell, purchased certain insurance policies from State National Insurance Company through the Defendants

including dram shop coverage for the bar located at 7101 Rising Sun Avenue, Philadelphia, PA 19111 .

13. State National Insurance Company has denied coverage and refused to defend and indemnify the assignor in the matter of Kelly v. BBK Tavern et al., C.C.P., Phila. Cty., May Term; 2009; No. 3424 (hereinafter also referred to as the "Kelly Litigation").

14. The Kelly litigation sought recovery of damages for severe and permanent injuries and economic losses sustained by Ronald and Patrice Kelly as a result of a motor vehicle accident that occurred on or about May 23, 2007. Among other things, Ronald and Patrice Kelly alleged In the Kelly Litigation that BBK Tavern, Inc., d/b/a The Princeton Tavern served alcoholic drinks to an openly intoxicated customer, who was immediately thereafter involved in a motor vehicle accident with Ronald Kelly.

15. At all times material to the pendency of the Kelly litigation, BBK Tavern, d/b/a The Princeton Tavern had dram shop coverage through State National Insurance Company which was purchased through the Defendants.

16. Upon being served with the Writ of Summons and suit papers in the Kelly litigation, John Bell and his counsel formally advised the Defendants of the pending litigation and requested defense and indemnity under the applicable dram shop insurance coverage then and there in full force and effect with State National Insurance Company.

17. Over the course of the pendency of the Kelly litigation on repeated occasions, John Bell and/or his counsel renewed their request of Defendants that they notify State National Insurance Company of the request for Indemnity and defense in the Kelly litigation.

18. The Defendants failed to timely notify State National Insurance Company of the Kelly Litigation and BBK Tavern, d/b/a The Princeton Tavern's request for indemnity and defense.

19. As a result of the careless, negligence, breach of contract and other culpable conduct of the Defendants, as alleged hereinafter, State National Insurance Company refused to indemnify BBK Tavern, d/b/a The Princeton Tavern for liability resulting from the Kelly litigation.

20. Based on the evidence obtained in discovery in the Kelly litigation, it became clear that the Kelly litigation had to be settled by BBK Tavern, d/b/a The Princeton Tavern to avoid a judgment against BBK Tavern, d/b/a The Princeton Tavern in the millions of dollars.

21. As a result of the careless, negligence, breach of contract and other culpable conduct of the Defendants, as alleged hereinafter BBK Tavern, d/b/a The Princeton Tavern was forced to accept a consent judgment in the amount of \$5,000,000.00.

22. Ronald Kelly and Patrice Kelly, as Assignees of BBK Tavern, Inc., d/b/a The Princeton Tavern, by and through its authorized representative, John Bell, hereby file this litigation upon a valid and enforceable assignment of rights. See true and correct copy of the material part of Assignment of Rights executed by the Kellys and John Bell on behalf of BBK Tavern d/b/a The Princeton Tavern attached as Exhibit "A".

Count I
Plaintiffs v. Defendants

23. Plaintiffs incorporate by reference the preceding paragraphs of this Complaint as though set forth fully herein.

24. The Defendants negligently failed to timely notify State National Insurance Company of the Kelly litigation and BBK Tavern, Inc., d/b/a The Princeton Tavern's request for indemnity and defense.

25. The Defendants knew or should have known that their failure to act reasonably and promptly would cause irreparable harm to BBK Tavern, d/b/a The Princeton Tavern.

26. The negligence, carelessness, and/or other culpable conduct of the Defendants consisted of the following:

- (a) Failure to promptly process the request for indemnity and defense;
- (b) Failing to promptly notify State National Insurance Company of the request for indemnity and defense;
- (c) Failing to act in the best interests of BBK Tavern, d/b/a The Princeton Tavern;
- (d) Failing in their duties to BBK Tavern, d/b/a The Princeton Tavern in violation of the laws of the Commonwealth of Pennsylvania;
- (e) Failing to fulfill their fiduciary duties to BBK Tavern, d/b/a The Princeton Tavern;
- (f) Failing to train their employees in order to have the degree of skill and knowledge requisite for their employment responsibilities;
- (g) Failing to exercise good faith and reasonable skill, care and diligence in the

execution of their employment responsibilities;

(h) Failing to possess reasonable knowledge concerning the reporting of litigation claims against the insureds; and

(i) Failing to exercise the care that a reasonably prudent business person in the brokerage field would exercise under similar circumstances.

27. As a result of the negligence of the Defendants, a default judgment was entered in the Kelly litigation.

28. By reason of the aforesaid carelessness, negligence and/or recklessness of the Defendants as hereinbefore alleged, BBK Tavern, d/b/a The Princeton Tavern suffered financially to its detriment as the insurance coverage which it had paid for did not cover indemnity and defense in the Kelly litigation and forced BBK Tavern, d/b/a The Princeton Tavern to enter into a stipulated judgment with Ronald and Patrice Kelly in the amount of Five Million Dollars for which it is liable.

WHEREFORE, Plaintiffs demand that judgment be entered in their favor and against Defendants, jointly and severally, in a sum in excess of Fifty Thousand (\$50,000.00) Dollars, plus delay damages, interest, attorneys fees and costs.

Count II
Plaintiffs v. Defendants

29. Plaintiffs incorporate by reference the preceding paragraphs of this Complaint as though set forth fully herein.

30. At all times material hereto, BBK Tavern, d/b/a The Princeton Tavern, entered into an oral contract with Defendants who would act as BBK Tavern, d/b/a The Princeton Tavern's insurance broker.

31. The Defendants had the duty to process the notice of claims made against BBK Tavern, d/b/a The Princeton Tavern in a timely manner.

32. The Defendants failed to process notice of the claims made in the Kelly litigation to State National Insurance Company.

33. The Defendants failed to discharge their duties imposed upon them by their oral contract with BBK Tavern, d/b/a The Princeton Tavern to obtain liability insurance and to promptly notify the applicable insurance carrier of claims made against BBK Tavern, d/b/a The Princeton Tavern.

34. As a direct and proximate result of the Defendants' aforesaid material breach, BBK Tavern, d/b/a The Princeton Tavern suffered financially to its detriment as the insurance coverage which it had paid for did not cover indemnity and defense in the Kelly litigation and forced BBK Tavern, d/b/a The Princeton Tavern to enter into a stipulated judgment with Ronald and Patrice Kelly in the amount of Five Million Dollars for which it is now liable.

WHEREFORE, Plaintiffs demand that judgment be entered in their favor and against Defendants, jointly and severally, in a sum in excess of Fifty Thousand (\$50,000.00) Dollars, plus delay damages, interest, attorneys fees and costs.

PANSINI & MEZROW, P.C.

BY: /s/ Michael O. Pansini
MICHAEL O. PANSINI, ESQUIRE
Attorney for Plaintiffs

Dated: 01/09/14

COMMONWEALTH OF PENNSYLVANIA :
 : SS
COUNTY OF PHILADELPHIA :

Ronald Kelly , being duly sworn according to law, deposes and says that he/she
is the Plaintiff in the foregoing action, and that the facts set forth in the Civil Action
Complaint are true and correct to the best of his/her knowledge, information and belief. I
understand that statements herein are made subject to the penalties of 18 Pa.C.S.A. §
4904 relating to unsworn falsification to authorities.

A handwritten signature in cursive script, reading "Ronald M. Kelly", written over a horizontal line.

DATE: 1/9/14

EXHIBIT “A”

Case ID: 130704825

Case ID: 141200233

Case ID: 130704825

Control No.: 14120601

CONFIDENTIAL
ASSIGNMENT AND COVENANT OF COOPERATION

This Assignment and Covenant of Cooperation is entered into on this 7 day of January, 2012, by and between Ronald and Patrice Kelly (collectively hereinafter referred to as "Assignees"), and BBK Tavern, Inc. d/b/a The Princeton Tavern (hereinafter referred to as "Assignor").

REDACTED

Case ID: 130704825

Case ID: 141200233

Case ID: 130704825

Control No.: 14120601

REDACTED

REDACTED

II. AGREEMENT

NOW THEREFORE, in consideration for the mutual promises and covenants set forth herein, the receipt and sufficiency of which is hereby acknowledged, and AGREEING AND INTENDING TO BE LEGALLY BOUND, the parties agree as follows:

A. Assignment of Claims

BBK Tavern, Inc. d/b/a The Princeton Tavern, by and through its authorized

representative, John Bell (collectively referred to as "Assignors"), do hereby agree to and do hereby assign to Ronald and Patrice Kelly, the assigned claims which include any and all rights in law and/or in equity that they now have or may in the future have, whether now known or hereinafter ascertained, against certain persons and companies including Carmen Corporation, Serge Carmen, and David Lehman, Esquire, their affiliates agents and employees arising out of or in any manner related to their handling or involvement in the Kelly Litigation and the negligent and improper failure to notify State National Insurance Company of the Kelly Litigation, including but not limited to the negligent and improper failure to notify State National Insurance Company of the Kelly Litigation. It is expressly intended that the rights so assigned hereby shall include, but not be limited to, any and all claims and/or remedies at law and/or in equity for bad faith, breach of contract, malpractice, professional malpractice, errors and omissions, negligence, breach of fiduciary duty or obligation, breach of implied and/or express covenants of fair dealing and good faith, and any and all other related actions, claims and/or causes of action arising out of or in any manner related to the Kelly Litigation and provision of and failure to provide insurance coverage, appropriate claims handling, a defense of claims, and indemnification. The claims, rights, causes and remedies described herein shall hereinafter be referred to as the "Assigned Claims".

The Assigned Claims may be pursued in the name of Ronald and Patrice Kelly, or BBK Tavern, Inc. d/b/a The Princeton Tavern as Assignees and as Assignees' counsel deems fit as Assignor is retaining an interest in the litigation as set forth in paragraph E below.

REDACTED

REDACTED

REDACTED

REDACTED

REDACTED

H. Execution and Counterparts

This Agreement shall become effective only upon its execution by the parties hereto.

It is understood, however, that this Agreement may be executed in counterparts, each of which shall be deemed an original, but which together shall constitute one and the same instrument.

Dated: 1/9/13

Ronald Kelly
Ronald Kelly

Dated: 1/9/13

Patrice Kelly
Patrice Kelly

Dated: 1/9/13

Michael Pansini
Michael Pansini, Esquire
Attorney for Assignees

Dated: 12-15-12

John Bell
John Bell on behalf of BBK Tavern,
Inc. d/b/a The Princeton Tavern

Dated: 1/2/13

Thomas Reilly
Thomas Reilly, Esquire
Attorney for Defendant BBK Tavern,
Inc. d/b/a The Princeton Tavern

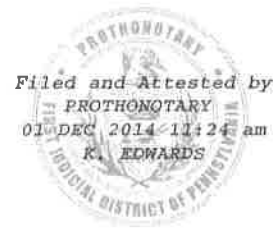


Exhibit "B"

Docket Report

Case Description

Case ID_: 130704825
Case Caption: KELLY ETAL VS THE CARMAN CORPORATION ETAL
Filing Date: Friday , August 02nd, 2013
Location: CH - City Hall
Case Type: 20 - PERSONAL INJURY - OTHER
Status: CLLSC - LISTED FOR SETTLEMENT CONF

Related Cases

No related cases were found.

Case Event Schedule

Event	Date/Time	Room	Location	Judge
PROJECTED SETTLEMENT CONF DATE	05-JAN-2015 09:00 AM	City Hall	Courtroom 246 City Hall	BERNSTEIN, MARK I
PROJECTED PRE-TRIAL CONF. DATE	02-MAR-2015 09:00 AM	City Hall	Courtroom 246 City Hall	BERNSTEIN, MARK I
PROJECTED TRIAL DATE	06-APR-2015 09:00 AM	City Hall	Courtroom 246 City Hall	BERNSTEIN, MARK I

Case Motions

Motion	Assign/Date	Control No	Date/Received	Judge
MOTION TO AMEND	07-NOV-2014	14102028	16-OCT-2014	SMITH, GREGORY E

Case Parties

Seq #	Assoc	Expn Date	Type	ID	Name
1			ATTORNEY FOR PLAINTIFF	A44455	PANSINI, MICHAEL O

Address:	PANSINI & MEZROW 1525 LOCUST ST 15TH FLOOR PHILADELPHIA PA 19102 (215)732-5555 (215)732-7872 - FAX	Aliases:	none		
2	1		PLAINTIFF	@7517577	KELLY, RONALD
Address:	518 REVOLUTIONARY WAY WARMINSTER PA 18974	Aliases:	none		
3	1		PLAINTIFF	@7517578	KELLY, PATRICE
Address:	518 REVOLUTIONARY WAY WARMINSTER PA 18974	Aliases:	none		
4	1		PLAINTIFF	@7517579	KELLY, RONALD
Address:	518 REVOLUTIONARY WAY WARMINSTER PA 18974	Aliases:	RONALD KELLY, AS ASSIGNEE OF BBK TAVERN, INC., D/B/A THE PRINCETON TAVERN, BY AND THROUGH ITS AUTHORIZED REPRESENTATIVE, JOHN BELL		
5	1		PLAINTIFF	@7517580	KELLY, PATRICE
Address:	518 REVOLUTIONARY WAY WARMINSTER PA 18974	Aliases:	PATRICE KELLY, AS ASSIGNEE OF BBK TAVERN, INC., D/B/A THE PRINCETON TAVERN, BY AND THROUGH ITS AUTHORIZED REPRESENTATIVE, JOHN BELL		

6	11		DEFENDANT	@7517581	THE CARMAN CORPORATION
Address:	940 W. SPROUL ROAD, SUITE 103 SPRINGFIELD PA 19064		Aliases:	none	
7	11		DEFENDANT	@7517582	THE CARMAN GROUP, INC.
Address:	940 W. SPROUL ROAD, SUITE 103 SPRINGFIELD PA 19064		Aliases:	none	
8	11		DEFENDANT	@7517583	THE CARMAN GROUP, LLC
Address:	940 W. SPROUL ROAD, SUITE 103 SPRINGFIELD PA 19064		Aliases:	none	
9	11		DEFENDANT	@7517584	CARMAN, SERGIUS B
Address:	940 W. SPROUL ROAD, SUITE 103 SPRINGFIELD PA 19064		Aliases:	none	
10			TEAM LEADER	J326	BERNSTEIN, MARK I
Address:	530 CITY HALL PHILADELPHIA PA 19107 (215)686-7335		Aliases:	none	
11			ATTORNEY FOR DEFENDANT	A55046	TUCKER, WENDY F

Address:	760 W. SPROUL ROAD SUITE 301 SPRINGFIELD PA 19064 (610)541-2893	Aliases:	none
12	11	ATTORNEY FOR DEFENDANT	A43261 ODONNELL, CHARLES M
Address:	SELECTIVE RISK MANAGEMENT SELECTIVE LAW GROUP 900 WEST SPROUL ROAD, SUITE 10 SPRINGFIELD PA 19064 (888)256-8687	Aliases:	none
13	1	ATTORNEY FOR PLAINTIFF	A43746 MEZROW, STEVEN M
Address:	PANSINI & MEZROW 1525 LOCUST ST 15TH FLOOR PHILADELPHIA PA 19102 (215)732-5555 (215)732-7872 - FAX	Aliases:	none

Docket Entries

<input type="checkbox"/> Check for Threaded Docket This feature will reduce the docket to motion related entries only.				
Filing Date/Time	Docket Type	Filing Party	Disposition Amount	Approval/ Entry Date
02-AUG-2013 12:29 PM	ACTIV - ACTIVE CASE			02-AUG-2013 12:31 PM

Docket Entry:	E-Filing Number: 1308003233			
02-AUG-2013 12:29 PM	CIVIJ - COMMENCEMENT CIVIL ACTION JURY	PANSINI, MICHAEL O		02-AUG-2013 12:31 PM
Documents:	Final Cover			
Docket Entry:	<i>none.</i>			
02-AUG-2013 12:29 PM	WRSUM - PRAE TO ISSUE WRIT OF SUMMONS	PANSINI, MICHAEL O		02-AUG-2013 12:31 PM
Documents:	Praeipce and Writ of Summons.pdf			
Docket Entry:	PRAECIPE TO ISSUE WRIT OF SUMMONS FILED. WRIT OF SUMMONS ISSUED.			
02-AUG-2013 12:29 PM	SSCG4 - SHERIFF'S SURCHARGE 4 DEFTS	PANSINI, MICHAEL O		02-AUG-2013 12:31 PM
Docket Entry:	<i>none.</i>			
02-AUG-2013 12:29 PM	JURYT - JURY TRIAL PERFECTED	PANSINI, MICHAEL O		02-AUG-2013 12:31 PM
Docket Entry:	12 JURORS REQUESTED.			
02-AUG-2013 12:29 PM	CLWCM - WAITING TO LIST CASE MGMT CONF	PANSINI, MICHAEL O		02-AUG-2013 12:31 PM
Docket Entry:	<i>none.</i>			
30-AUG-2013 03:04 PM	SHSRV - SHERIFF'S SERVICE	PANSINI, MICHAEL O		30-AUG-2013 03:05 PM
Documents:	Affidavit of Service The Carman Corporation.pdf			

Case ID: 141200233

Case ID: 130704825

Control No.: 14120601

Docket Entry:	DEPUTIZED SERVICE OF PLAINTIFF'S WRIT OF SUMMONS UPON THE CARMAN CORPORATION BY SHERIFF OF DELAWARE COUNTY ON 08/20/2013. (FILED ON BEHALF OF PATRICE KELLY, RONALD KELLY, PATRICE KELLY AND RONALD KELLY)			
30-AUG-2013 03:09 PM	ATSNF - ATTEMPTED SERVICE - NOT FOUND	PANSINI, MICHAEL O		30-AUG-2013 03:54 PM
Documents:	Proof of Non Service The Carman Group Inc.pdf			
Docket Entry:	THE CARMAN GROUP, INC. NOT FOUND ON 08/20/2013. (FILED ON BEHALF OF PATRICE KELLY, RONALD KELLY, PATRICE KELLY AND RONALD KELLY)			
30-AUG-2013 03:12 PM	ATSNF - ATTEMPTED SERVICE - NOT FOUND	PANSINI, MICHAEL O		30-AUG-2013 03:54 PM
Documents:	Proof of Non Service The Carman Group LLC.pdf			
Docket Entry:	THE CARMAN GROUP, LLC NOT FOUND ON 08/20/2013. (FILED ON BEHALF OF PATRICE KELLY, RONALD KELLY, PATRICE KELLY AND RONALD KELLY)			
30-AUG-2013 03:15 PM	ATSNF - ATTEMPTED SERVICE - NOT FOUND	PANSINI, MICHAEL O		30-AUG-2013 03:54 PM
Documents:	Proof of Non Service Sergius Carman.pdf			
Docket Entry:	SERGIUS B CARMAN NOT FOUND ON 08/20/2013. (FILED ON BEHALF OF PATRICE KELLY, RONALD KELLY, PATRICE KELLY AND RONALD KELLY)			
30-AUG-2013 03:18 PM	WRSUR - PRAECIPE TO REISSUE SUMMONS	PANSINI, MICHAEL O		30-AUG-2013 03:23 PM
Documents:	Praecipe to Reissue Writ of Summons.pdf Praecipe and Writ Summons.pdf			
Docket Entry:	PREACIPE TO REISSUE WRIT OF SUMMONS FILED. WRIT REISSUED. (FILED ON BEHALF OF PATRICE KELLY, RONALD KELLY, PATRICE KELLY AND RONALD KELLY)			

27-SEP-2013 04:57 PM	WRSUR - PRAECIPE TO REISSUE SUMMONS	PANSINI, MICHAEL O		30-SEP-2013 07:32 AM
Documents:	Praecipe to Reissue Writ Summons.pdf Writ and Summons.pdf			
Docket Entry:	PREACIPE TO REISSUE WRIT OF SUMMONS FILED. WRIT REISSUED. (FILED ON BEHALF OF PATRICE KELLY, RONALD KELLY, PATRICE KELLY AND RONALD KELLY)			
04-OCT-2013 01:47 PM	CLLCM - LISTED FOR CASE MGMT CONF			04-OCT-2013 01:47 PM
Docket Entry:	<i>none.</i>			
08-OCT-2013 12:41 AM	CLNGV - NOTICE GIVEN			08-OCT-2013 12:41 AM
Docket Entry:	<i>none.</i>			
05-NOV-2013 12:08 PM	CMPLT - COMPLAINT FILED NOTICE GIVEN	PANSINI, MICHAEL O		05-NOV-2013 12:09 PM
Documents:	Civil Action Complaint.pdf			
Docket Entry:	COMPLAINT WITH NOTICE TO DEFEND WITHIN TWENTY (20) DAYS AFTER SERVICE IN ACCORDANCE WITH RULE 1018.1 FILED. (FILED ON BEHALF OF PATRICE KELLY, RONALD KELLY, PATRICE KELLY AND RONALD KELLY)			
05-NOV-2013 04:24 PM	MTSVR - MOTION FOR ALTERNATIVE SERVICE	PANSINI, MICHAEL O		06-NOV-2013 02:39 PM
Documents:	Motion for Alternative Service.pdf Motion CoverSheet Form			
Docket Entry:	51-13110851 MOTION FOR ALTERNATIVE SERVICE (FILED ON BEHALF OF PATRICE KELLY, RONALD KELLY, PATRICE KELLY AND RONALD KELLY)			

06-NOV-2013 09:25 AM	CLCCC - CASE MGMT CONFERENCE COMPLETED	PELLETREAU, CHARLES		06-NOV-2013 09:25 AM
Docket Entry:	<i>none.</i>			
06-NOV-2013 09:25 AM	CMOIS - CASE MANAGEMENT ORDER ISSUED			06-NOV-2013 09:25 AM
Documents:	CMOIS_17.pdf			
Docket Entry:	<p>CASE MANAGEMENT ORDER STANDARD TRACK - AND NOW, 06-NOV-2013, it is Ordered that: 1. The case management and time standards adopted for standard track cases shall be applicable to this case and are hereby incorporated into this Order. 2. All discovery on the above matter shall be completed not later than 06-OCT-2014. 3. Plaintiff shall identify and submit curriculum vitae and expert reports of all expert witnesses intended to testify at trial to all other parties not later than 06-OCT-2014. 4. Defendant and any additional defendants shall identify and submit curriculum vitae and expert reports of all expert witnesses intended to testify at trial not later than 03-NOV-2014. 5. All pre-trial motions shall be filed not later than 03-NOV-2014. 6. A settlement conference may be scheduled at any time after 03-NOV-2014. Prior to the settlement conference all counsel shall serve all opposing counsel and file a settlement memorandum containing the following: (a) A concise summary of the nature of the case if plaintiff or of the defense if defendant or additional defendant; (b) A statement by the plaintiff or all damages accumulated, including an itemization of injuries and all special damages claimed by categories and amount; (c) Defendant shall identify all applicable insurance carriers, together with applicable limits of liability. 7. A pre-trial conference will be scheduled any time after 05-JAN-2015. Fifteen days prior to pre-trial conference, all counsel shall serve all opposing counsel and file a pre-trial memorandum containing the following: (a) A concise summary of the nature of the case if plaintiff or the defense if defendant or additional defendant; (b) A list of all witnesses who may be called to testify at trial by name and address. Counsel should expect witnesses not listed to be precluded from testifying at trial; (c) A list of all exhibits the party intends to offer into evidence. All exhibits shall be pre-numbered and shall be exchanged among counsel prior to the conference. Counsel should expect any exhibit not listed to be precluded at trial; (d) Plaintiff shall list an itemization of injuries or damages sustained together with all special damages claimed by category and amount. This list shall include as appropriate, computations of all past lost earnings and future lost earning capacity or medical expenses together with any other unliquidated damages claimed; and (e) Defendant shall state in position</p>			

	regarding damages and shall identify all applicable insurance carriers, together with applicable limits of liability; (f) Each counsel shall provide an estimate of the anticipated length of trial. 8. It is expected that the case will be ready for trial 02-FEB-2015, and counsel should anticipate trial to begin expeditiously thereafter. 9. All counsel are under a continuing obligation and are hereby ordered to serve a copy of this order upon all unrepresented parties and upon all counsel entering an appearance subsequent to the entry of this order. ...BY THE COURT: MARK BERNSTEIN, J.		
06-NOV-2013 09:25 AM	CLLSC - LISTED FOR SETTLEMENT CONF		06-NOV-2013 09:25 AM
Docket Entry:	none.		
06-NOV-2013 09:25 AM	ZR236 - NOTICE GIVEN UNDER RULE 236		06-NOV-2013 12:44 PM
Docket Entry:	NOTICE GIVEN ON 06-NOV-2013 OF CASE MANAGEMENT ORDER ISSUED ENTERED ON 06-NOV-2013.		
06-NOV-2013 09:25 AM	CLLPT - LISTED FOR PRE-TRIAL CONF		06-NOV-2013 09:25 AM
Docket Entry:	none.		
06-NOV-2013 09:25 AM	CLLTR - LISTED FOR TRIAL		06-NOV-2013 09:25 AM
Docket Entry:	none.		
07-NOV-2013 01:26 PM	MTASN - MOTION ASSIGNED		07-NOV-2013 01:26 PM
Docket Entry:	51-13110851 MOTION FOR ALTERNATIVE SERVICE ASSIGNED TO JUDGE: BERNSTEIN, MARK I. ON DATE: NOVEMBER 07, 2013		
19-NOV-2013 08:06 PM	ORDER - ORDER ENTERED/236 NOTICE	BERNSTEIN, MARK I	19-NOV-2013 08:06 PM

	GIVEN			
Documents:	ORDER_24.pdf			
Docket Entry:	51-13110851 IT IS ORDERED THAT THE PLAINTIFF'S MOTION FOR ALTERNATIVE SERVICE IS GRANTED, PERMITTING SERVICE BY: REGULAR AND CERTIFIED MAIL UPON DEFENDANTS, THE CARMAN GROUP, INC., THE CARMAN GROUP, LLC AND SERGIUS B. CARMAN AT 940 W. SPROUL ROAD, SUITE 103, SPRINGFIELD, PA 19064. ...BY THE COURT; BERNSTEIN, J. 11-18-13			
19-NOV-2013 08:06 PM	ZR236 - NOTICE GIVEN UNDER RULE 236			21-NOV-2013 04:57 PM
Docket Entry:	NOTICE GIVEN ON 21-NOV-2013 OF ORDER ENTERED/236 NOTICE GIVEN ENTERED ON 19-NOV-2013.			
26-NOV-2013 10:47 AM	WRSUR - PRAECIPE TO REISSUE SUMMONS	PANSINI, MICHAEL O		26-NOV-2013 12:09 PM
Documents:	Praeipce to Reissue Writ of Summons.pdf Praeipce and Writ of Summons.pdf			
Docket Entry:	PREACIPE TO REISSUE WRIT OF SUMMONS FILED. WRIT REISSUED. (FILED ON BEHALF OF PATRICE KELLY, RONALD KELLY, PATRICE KELLY AND RONALD KELLY)			
26-NOV-2013 10:51 AM	CMREI - PRAECIPE TO REINSTATE CMPLT	PANSINI, MICHAEL O		26-NOV-2013 12:08 PM
Documents:	Praeipce to Reinstate Complaint.pdf Complaint.pdf			
Docket Entry:	COMPLAINT WITH NOTICE TO DEFEND WITHIN TWENTY (20) DAYS AFTER SERVICE IN ACCORDANCE WITH RULE 1018.1 REINSTATED. (FILED ON BEHALF OF PATRICE KELLY, RONALD KELLY, PATRICE KELLY AND RONALD KELLY)			
09-DEC-2013 11:27 AM	AFDVT - AFFIDAVIT OF SERVICE FILED	PANSINI, MICHAEL O		09-DEC-2013 11:28 AM
Documents:	Affidavit of Service The Carman Group Inc.pdf			
Docket Entry:	AFFIDAVIT OF SERVICE OF PLAINTIFFS' COMPLAINT AND PLAINTIFFS' WRIT OF SUMMONS UPON THE CARMAN GROUP, INC. BY CERTIFIED MAIL, FIRST CLASS REGULAR MAIL ON 11/27/2013			

Case ID: 141200233

Case ID: 130704825

Control No.: 14120601

	FILED. (FILED ON BEHALF OF PATRICE KELLY, RONALD KELLY, PATRICE KELLY AND RONALD KELLY)			
09-DEC-2013 11:32 AM	AFDVT - AFFIDAVIT OF SERVICE FILED	PANSINI, MICHAEL O		09-DEC-2013 11:39 AM
Documents:	Affidavit of Service The Carman Group LLC.pdf			
Docket Entry:	AFFIDAVIT OF SERVICE OF PLAINTIFFS' COMPLAINT AND PLAINTIFFS' WRIT OF SUMMONS UPON THE CARMAN GROUP, LLC BY CERTIFIED MAIL, FIRST CLASS REGULAR MAIL ON 11/27/2013 FILED. (FILED ON BEHALF OF PATRICE KELLY, RONALD KELLY, PATRICE KELLY AND RONALD KELLY)			
09-DEC-2013 11:35 AM	AFDVT - AFFIDAVIT OF SERVICE FILED	PANSINI, MICHAEL O		09-DEC-2013 11:43 AM
Documents:	Affidavit of Service Sergius B. Carman.pdf			
Docket Entry:	AFFIDAVIT OF SERVICE OF PLAINTIFFS' COMPLAINT AND PLAINTIFFS' WRIT OF SUMMONS UPON SERGIUS B CARMAN BY CERTIFIED MAIL, FIRST CLASS REGULAR MAIL ON 11/27/2013 FILED. (FILED ON BEHALF OF PATRICE KELLY, RONALD KELLY, PATRICE KELLY AND RONALD KELLY)			
20-DEC-2013 01:22 PM	ENAPP - ENTRY OF APPEARANCE FILED	TUCKER, WENDY F		20-DEC-2013 01:37 PM
Documents:	Entry of Appearance and Cert.pdf			
Docket Entry:	ENTRY OF APPEARANCE OF WENDY F TUCKER FILED. (FILED ON BEHALF OF SERGIUS B CARMAN, THE CARMAN GROUP, LLC, THE CARMAN GROUP, INC. AND THE CARMAN CORPORATION)			
20-DEC-2013 01:32 PM	PROBJ - PRELIMINARY OBJECTIONS	TUCKER, WENDY F		20-DEC-2013 02:07 PM
Documents:	POs, LM, Order, COS.pdf Exhibit A.pdf Exhibit B.pdf			
Docket Entry:	65-13122865 PRELIMINARY OBJECTIONS TO PLAINTIFF'S COMPLAINT FILED. RESPONSE DATE: 01/09/2014 (FILED ON BEHALF OF SERGIUS B CARMAN, THE CARMAN GROUP, LLC, THE CARMAN GROUP, INC. AND THE CARMAN CORPORATION)			

09-JAN-2014 12:03 PM	CMAMD - AMENDED COMPLAINT FILED	PANSINI, MICHAEL O		09-JAN-2014 12:28 PM
Documents:	Amended Complaint.pdf			
Docket Entry:	AMENDED COMPLAINT WITH NOTICE TO DEFEND WITHIN TWENTY(20) DAYS AFTER SERVICE IN ACCORDANCE WITH RULE 1018.1 FILED. (FILED ON BEHALF OF PATRICE KELLY, RONALD KELLY, PATRICE KELLY AND RONALD KELLY)			
13-JAN-2014 09:37 AM	PODAM - PRELIM OBJECTIONS-MARKED MOOT			13-JAN-2014 09:37 AM
Docket Entry:	65-13122865 AMENDED COMPLAINT WITH NOTICE TO DEFEND WITHIN TWENTY(20) DAYS AFTER SERVICE IN ACCORDANCE WITH RULE 1018.1 FILED.			
01-AUG-2014 02:36 PM	ANCOM - ANSWER TO COMPLAINT FILED	TUCKER, WENDY F		04-AUG-2014 09:40 AM
Documents:	Ans to Amended Complaint with New Matter.pdf			
Docket Entry:	ANSWER WITH NEW MATTER TO PLAINTIFF'S AMENDED COMPLAINT FILED. (FILED ON BEHALF OF SERGIUS B CARMAN, THE CARMAN GROUP, LLC, THE CARMAN GROUP, INC. AND THE CARMAN CORPORATION)			
28-AUG-2014 03:52 PM	ENAPC - ENTRY OF APPEARANCE-CO COUNSEL	ODONNELL, CHARLES M		29-AUG-2014 10:09 AM
Documents:	Entry of Appearance and Cert - CMOD.pdf			
Docket Entry:	ENTRY OF APPEARANCE OF CHARLES M ODONNELL AS CO-COUNSEL FILED. (FILED ON BEHALF OF SERGIUS B CARMAN, THE CARMAN GROUP, LLC, THE CARMAN GROUP, INC. AND THE CARMAN CORPORATION)			
08-SEP-2014 04:05 PM	DSCIM - DISCOVERY HEARING REQST FILED	PANSINI, MICHAEL O		09-SEP-2014 08:22 AM
Documents:	Pls Motion to Compel Discovery Responses.pdf Exhibit A - Pls MTC Discovery Responses.pdf Exhibit B - Pls MTC Discovery Responses.pdf			

Docket Entry:	DISCOVERY HEARING REQUEST FILED IN RE: MOTION TO COMPEL ANSWERS AND PRODUCTION OF DOCUMENTS. HEARING SCHEDULED FOR: SEPTEMBER 22, 2014 AT 01:00 IN ROOM 246 CITY HALL. (FILED ON BEHALF OF RONALD KELLY, PATRICE KELLY, RONALD KELLY AND PATRICE KELLY)			
01-OCT-2014 03:10 PM	MTEXR - MOT-FOR EXTRAORDINARY RELIEF	TUCKER, WENDY F		02-OCT-2014 10:14 AM
Documents:	Motion for Extraordinary Relief.pdf Motion CoverSheet Form			
Docket Entry:	04-14100204 RESPONSE DATE 10/14/2014. (FILED ON BEHALF OF SERGIUS B CARMAN, THE CARMAN GROUP, LLC, THE CARMAN GROUP, INC. AND THE CARMAN CORPORATION)			
02-OCT-2014 04:22 PM	RPNMT - REPLY TO NEW MATTER	PANSINI, MICHAEL O		03-OCT-2014 08:17 AM
Documents:	Pls Reply to New Matter.pdf			
Docket Entry:	REPLY TO NEW MATTER OF THE CARMAN GROUP, LLC, THE CARMAN GROUP, INC., THE CARMAN CORPORATION AND SERGIUS B CARMAN FILED. (FILED ON BEHALF OF PATRICE KELLY, RONALD KELLY, PATRICE KELLY AND RONALD KELLY)			
06-OCT-2014 08:02 AM	ENAPC - ENTRY OF APPEARANCE-CO COUNSEL	MEZROW, STEVEN M		06-OCT-2014 10:48 AM
Documents:	EOA SMM.pdf			
Docket Entry:	ENTRY OF APPEARANCE OF STEVEN M MEZROW AS CO-COUNSEL FILED. (FILED ON BEHALF OF PATRICE KELLY, RONALD KELLY, PATRICE KELLY AND RONALD KELLY)			
06-OCT-2014 08:10 AM	DSCIM - DISCOVERY HEARING REQST FILED	PANSINI, MICHAEL O		06-OCT-2014 08:22 AM
Documents:	Pls Motion to Compel Depositions.pdf			
Docket Entry:	DISCOVERY HEARING REQUEST FILED IN RE: MOTION TO COMPEL DEPOSITION. HEARING SCHEDULED FOR: OCTOBER 21, 2014 AT 01:00 IN ROOM 246 CITY HALL. (FILED ON BEHALF OF RONALD			

KELLY, PATRICE KELLY, RONALD KELLY AND PATRICE KELLY)				
06-OCT-2014 08:18 AM	DSCIM - DISCOVERY HEARING REQST FILED	PANSINI, MICHAEL O		06-OCT-2014 08:28 AM
Documents:	Motion to Strike Objections and Compel Answers.pdf Exhibit A - Motion to Strike Objections and Compel Answers.pdf Exhibit B - Motion to Strike Objections and Compel Answers.pdf			
Docket Entry:	DISCOVERY HEARING REQUEST FILED IN RE: MOTION TO STRIKE OBJECTIONS AND COMPEL ANSWERS. HEARING SCHEDULED FOR: OCTOBER 21, 2014 AT 01:00 IN ROOM 246 CITY HALL. (FILED ON BEHALF OF RONALD KELLY, PATRICE KELLY, RONALD KELLY AND PATRICE KELLY)			
06-OCT-2014 10:53 AM	DSCIM - DISCOVERY HEARING REQST FILED	MEZROW, STEVEN M		06-OCT-2014 12:53 PM
Documents:	Motion to Quash Subpoena Kowalski.pdf Exhibit A - Motion to Quash Subpoena Kowalski.pdf Exhibit B - Motion to Quash Subpoena Kowalski.pdf			
Docket Entry:	DISCOVERY HEARING REQUEST FILED IN RE: MOTION TO QUASH SUBPOENA. HEARING SCHEDULED FOR: OCTOBER 21, 2014 AT 01:00 IN ROOM 246 CITY HALL. (FILED ON BEHALF OF RONALD KELLY, PATRICE KELLY, RONALD KELLY AND PATRICE KELLY)			
06-OCT-2014 10:55 AM	DSCIM - DISCOVERY HEARING REQST FILED	MEZROW, STEVEN M		06-OCT-2014 12:53 PM
Documents:	Motion to Quash Subpoena Pansini.pdf Exhibit A - Motion to Quash Subpoena Pansini.pdf Exhibit B - Motion to Quash Subpoena Pansini.pdf			
Docket Entry:	DISCOVERY HEARING REQUEST FILED IN RE: MOTION TO QUASH SUBPOENA. HEARING SCHEDULED FOR: OCTOBER 21, 2014 AT 01:00 IN ROOM 246 CITY HALL. (FILED ON BEHALF OF RONALD KELLY, PATRICE KELLY, RONALD KELLY AND PATRICE KELLY)			
06-OCT-2014 04:23 PM	DSCIM - DISCOVERY HEARING REQST FILED	TUCKER, WENDY F		07-OCT-2014 08:34 AM
Documents:	Motion to Compel Discovery.pdf			

Docket Entry:	DISCOVERY HEARING REQUEST FILED IN RE: MOTION TO COMPEL REQUEST FOR PRODUCTION. HEARING SCHEDULED FOR: OCTOBER 21, 2014 AT 01:00 IN ROOM 246 CITY HALL. (FILED ON BEHALF OF THE CARMAN CORPORATION, THE CARMAN GROUP, INC., THE CARMAN GROUP, LLC AND SERGIUS B CARMAN)			
06-OCT-2014 04:25 PM	DSCIM - DISCOVERY HEARING REQST FILED	TUCKER, WENDY F		07-OCT-2014 08:35 AM
Documents:	Motion to Compel Deps of Plaintiffs.pdf			
Docket Entry:	DISCOVERY HEARING REQUEST FILED IN RE: MOTION TO COMPEL DEPOSITION. HEARING SCHEDULED FOR: OCTOBER 21, 2014 AT 01:00 IN ROOM 246 CITY HALL. (FILED ON BEHALF OF THE CARMAN CORPORATION, THE CARMAN GROUP, INC., THE CARMAN GROUP, LLC AND SERGIUS B CARMAN)			
06-OCT-2014 04:27 PM	DSCIM - DISCOVERY HEARING REQST FILED	TUCKER, WENDY F		07-OCT-2014 08:35 AM
Documents:	Motion to Compel Pansini and Kowalski.pdf			
Docket Entry:	DISCOVERY HEARING REQUEST FILED IN RE: MOTION TO COMPEL DEPOSITION. HEARING SCHEDULED FOR: OCTOBER 21, 2014 AT 01:00 IN ROOM 246 CITY HALL. (FILED ON BEHALF OF THE CARMAN CORPORATION, THE CARMAN GROUP, INC., THE CARMAN GROUP, LLC AND SERGIUS B CARMAN)			
10-OCT-2014 01:27 PM	CLLSC - LISTED FOR SETTLEMENT CONF			10-OCT-2014 01:27 PM
Docket Entry:	<i>none.</i>			
10-OCT-2014 01:27 PM	CLCDS - CONFERENCE DATE SET			10-OCT-2014 01:27 PM
Docket Entry:	<i>none.</i>			

13-OCT-2014 04:03 PM	MTANS - ANSWER (MOTION/PETITION) FILED	PANSINI, MICHAEL O		14-OCT-2014 04:45 PM
Documents:	Pls Response to Ds Motion for Extraordinary Relief.pdf Exhibit A - Response to Mt4Extra Relief.pdf Exhibit B - Response to Mt4Extra Relief.pdf Exhibit C - Response to Mt4Extra Relief.pdf Exhibit D - Response to Mt4Extra Relief.pdf Exhibit E - Response to Mt4Extra Relief.pdf Exhibit F - Response to Mt4Extra Relief.pdf Exhibit G - Response to Mt4Extra Relief.pdf Exhibit H - Response to Mt4Extra Relief.pdf Exhibit I - Response to Mt4Extra Relief.pdf Motion CoverSheet Form			
Docket Entry:	04-14100204 ANSWER IN OPPOSITION OF MOT-FOR EXTRAORDINARY RELIEF FILED. (FILED ON BEHALF OF PATRICE KELLY, RONALD KELLY, PATRICE KELLY AND RONALD KELLY)			
14-OCT-2014 12:34 AM	CLNGV - NOTICE GIVEN			14-OCT-2014 12:34 AM
Docket Entry:	none.			
16-OCT-2014 01:53 PM	MTAMD - MOTION TO AMEND	TUCKER, WENDY F		16-OCT-2014 02:35 PM
Documents:	Motion to Amend New Matter.pdf Motion CoverSheet Form			
Docket Entry:	28-14102028 RESPONSE DATE 11/05/2014. (FILED ON BEHALF OF SERGIUS B CARMAN, THE CARMAN GROUP, LLC, THE CARMAN GROUP, INC. AND THE CARMAN CORPORATION)			
16-OCT-2014 03:53 PM	MTASN - MOTION ASSIGNED			16-OCT-2014 03:53 PM
Docket Entry:	04-14100204 MOT-FOR EXTRAORDINARY RELIEF ASSIGNED TO JUDGE: BERNSTEIN, MARK I. ON DATE: OCTOBER 16, 2014			
22-OCT-2014 01:11 PM	ORDER - ORDER ENTERED/236 NOTICE GIVEN	BERNSTEIN, MARK I		22-OCT-2014 12:00 AM
Documents:	ORDER_54.pdf			

Docket Entry:	AND NOW, THIS 21ST DAY OF OCTOBER, 2014, UPON CONSIDERATION OF DEFENDANTS, THE CARMEN CORPORATION, THE CARMEN GROUP, INC., THE CARMEN GROUP, LLC, AND SERGIUS B. CARMAN'S MOTION TO COMPEL DEPOSITIONS, AND ANY RESPONSES THERETO, IT IS HEREBY ORDERED AND DECREED THAT SAID MOTION IS GRANTED. IT IS FURTHER ORDERED AND DECREED: PATRICK KELLY IS HEREBY ORDERED TO APPEAR FOR DEPOSITION ON OR ABOUT 10/24/2014. FAILURE TO COMPLY WITH THIS ORDER MAY RESULT IN SANCTIONS, UPON FURTHER APPLICATION.....BY THE COURT: BERNSTEIN,J. 10/21/2014			
22-OCT-2014 01:11 PM	ZR236 - NOTICE GIVEN UNDER RULE 236			23-OCT-2014 11:43 AM
Docket Entry:	NOTICE GIVEN ON 23-OCT-2014 OF ORDER ENTERED/236 NOTICE GIVEN ENTERED ON 22-OCT-2014.			
22-OCT-2014 01:14 PM	ORDER - ORDER ENTERED/236 NOTICE GIVEN	BERNSTEIN, MARK I		22-OCT-2014 12:00 AM
Documents:	ORDER_55.pdf			
Docket Entry:	AND NOW, THIS 21ST DAY OF OCTOBER, 2014, UPON CONSIDERATION OF DEFENDANTS', THE CARMEN CORPORATION, THE CARMEN GROUP, INC., THE CARMEN GROUP, LLC, AND SERGIOUS B. CARMAN'S MOTION TO COMPEL DISCOVERY, AND ANY RESPONSE THERETO, IT IS HEREBY ORDERED AND DECREED THAT SAID MOTION IS DENIED.....BY THE COURT: BERNSTEIN,J. 10/21/2014			
22-OCT-2014 01:14 PM	ZR236 - NOTICE GIVEN UNDER RULE 236			23-OCT-2014 11:43 AM
Docket Entry:	NOTICE GIVEN ON 23-OCT-2014 OF ORDER ENTERED/236 NOTICE GIVEN ENTERED ON 22-OCT-2014.			
22-OCT-2014 01:19 PM	ORDER - ORDER ENTERED/236 NOTICE GIVEN	BERNSTEIN, MARK I		22-OCT-2014 12:00 AM
Documents:	ORDER_56.pdf			
Docket Entry:	AND NOW, THIS 21ST DAY OF OCTOBER, 2014, UPO CONSIDERATION OF PLAINTIFF'S MOTION TO QUASH SUBPOENA			

FOR DEPOSITION OF MICHAEL O. PANSINI, ESQ., AND FOR PROTECTIVE ORDER, IT IS HEREBY ORDERED THAT THE MOTION TO QUASH IS DENIED.....BY THE COURT: BERNSTEIN,J. 10/21/2014				
22-OCT-2014 01:19 PM	ZR236 - NOTICE GIVEN UNDER RULE 236			23-OCT-2014 11:43 AM
Docket Entry:	NOTICE GIVEN ON 23-OCT-2014 OF ORDER ENTERED/236 NOTICE GIVEN ENTERED ON 22-OCT-2014.			
22-OCT-2014 01:21 PM	ORDER - ORDER ENTERED/236 NOTICE GIVEN	BERNSTEIN, MARK I		22-OCT-2014 12:00 AM
Documents:	ORDER_57.pdf			
Docket Entry:	AND NOW, THIS 21ST DAY OF OCTOBER, 2014, UPO CONSIDERATION OF PLAINTIFF'S MOTION TO QUASH SUBPOENA FOR DEPOSITION OF GREGORY J. KOWALSKI, ESQ., AND FOR PROTECTIVE ORDER, IT IS HEREBY ORDERED THAT THE MOTION TO QUASH IS DENIED.....BY THE COURT: BERNSTEIN,J. 10/21/2014			
22-OCT-2014 01:21 PM	ZR236 - NOTICE GIVEN UNDER RULE 236			23-OCT-2014 11:43 AM
Docket Entry:	NOTICE GIVEN ON 23-OCT-2014 OF ORDER ENTERED/236 NOTICE GIVEN ENTERED ON 22-OCT-2014.			
22-OCT-2014 01:22 PM	ORDER - ORDER ENTERED/236 NOTICE GIVEN	BERNSTEIN, MARK I		22-OCT-2014 12:00 AM
Documents:	ORDER_58.pdf			
Docket Entry:	AND NOW, THIS 21ST DAY OF OCTOBER, 2014, UPON CONSIDERATION OF PLAINTIFF'S MOTION TO STRIKE OBJECTIONS AND COMPEL ANSWERS TO PLAINTIFFS' INTERROGATORIES-SET I AND REQUEST FOR PRODUCTION OF DOCUMENTS, IT IS HEREBY ORDERED THAT SAID MOTION IS GRANTED.....SEE ORDER FOR FURTHER TERMS AND CONDITIONS.....BY THE COURT: BERNSTEIN,J. 10/21/2014			
22-OCT-2014 01:22 PM	ZR236 - NOTICE GIVEN UNDER RULE 236			23-OCT-2014 11:43 AM

Docket Entry:	NOTICE GIVEN ON 23-OCT-2014 OF ORDER ENTERED/236 NOTICE GIVEN ENTERED ON 22-OCT-2014.			
22-OCT-2014 01:24 PM	ORDER - ORDER ENTERED/236 NOTICE GIVEN	BERNSTEIN, MARK I		22-OCT-2014 12:00 AM
Documents:	ORDER_59.pdf			
Docket Entry:	AND NOW, THIS 21ST DAY OF OCTOBER, 2014, UPON CONSIDERATION OF PLAINTIFFS' MOTION TO COMPEL DEPOSITIONS OF EDWARD SNOW, IT IS HEREBY ORDERED THAT SAID MOTION IS GRANTED. IT IS HEREBY ORDERED THAT EDWARD SNOW SHALL APPEAR FOR HIS DEPOSITION ON 10/24/2014 IN THE OFFICE OF PANSINI & MEZROW OR SUFFER SANCTIONS UPON FURTHER APPLICATION TO THIS COURT.....BY THE COURT: BERNSTEIN,J. 10/21/2014			
22-OCT-2014 01:24 PM	ZR236 - NOTICE GIVEN UNDER RULE 236			23-OCT-2014 11:43 AM
Docket Entry:	NOTICE GIVEN ON 23-OCT-2014 OF ORDER ENTERED/236 NOTICE GIVEN ENTERED ON 22-OCT-2014.			
23-OCT-2014 03:30 PM	ORDER - ORDER ENTERED/236 NOTICE GIVEN	BERNSTEIN, MARK I		23-OCT-2014 03:30 PM
Documents:	ORDER_66.pdf			
Docket Entry:	04-14100204 IT IS ORDERED THAT THE MOTION FOR EXTRAORDINARY RELIEF IS GRANTED AND THE DEADLINES ARE EXTENDED AS SET FORTH IN ORDER. SEE ORDER AND REVISED CASE MANAGMENT ORDER FOR NEW DEADLINES. ...BY THE COURT; BERNSTEIN, J. 10-21-14			
23-OCT-2014 03:30 PM	ZR236 - NOTICE GIVEN UNDER RULE 236			24-OCT-2014 04:57 PM
Docket Entry:	NOTICE GIVEN ON 24-OCT-2014 OF ORDER ENTERED/236 NOTICE GIVEN ENTERED ON 23-OCT-2014.			
23-OCT-2014 03:49 PM	RVCMO - REVISED CASE MGMT ORDER			23-OCT-2014 12:00 AM

	ISSUED			
Documents:	RVCMO_67.pdf			
Docket Entry:	REVISED CASE MANAGEMENT ORDER - Be advised that the Case Management Order issued for the above-captioned action has been revised as follows: All discovery shall be completed not later than 01-DEC-2014. Plaintiff shall submit expert reports not later than 01-DEC-2014. Defendant shall submit expert reports not later than 05-JAN-2015. All pre-trial motions shall be filed not later than 05-JAN-2015. A settlement conference will be scheduled any time after 05-JAN-2015. A pre-trial conference will be scheduled at any time after 02-MAR-2015. It is expected that this case shall be ready for trial by 06-APR-2015. All other terms and conditions on the original Case Management Order will remain in full force and effect. ...BY THE COURT: MARK BERNSTEIN, J.			
23-OCT-2014 03:50 PM	ZR236 - NOTICE GIVEN UNDER RULE 236			24-OCT-2014 05:00 PM
Docket Entry:	NOTICE GIVEN ON 24-OCT-2014 OF REVISED CASE MGMT ORDER ISSUED ENTERED ON 23-OCT-2014.			
28-OCT-2014 11:23 AM	CLRBC - CASE RESCHEDULED BY COURT	BERNSTEIN, MARK I		28-OCT-2014 11:23 AM
Docket Entry:	none.			
28-OCT-2014 11:24 AM	CLLSC - LISTED FOR SETTLEMENT CONF			28-OCT-2014 11:24 AM
Docket Entry:	none.			
05-NOV-2014 04:49 PM	MTANS - ANSWER (MOTION/PETITION) FILED	PANSINI, MICHAEL O		06-NOV-2014 02:30 PM
Documents:	Order Pls Ans to Defs Motion to Amend New Matter.pdf Pls Ans to Defs Motion to Amend New Matter.pdf Pls Ans MOL to Defs Motion to Amend New Matter.pdf COS Pls Ans to Defs Motion to Amend New Matter.pdf Exhibit A - Pls Ans to Defs Motion to Amend New Matter.pdf Exhibit B - Pls Ans to Defs Motion to Amend New Matter.pdf			

	Exhibit C - Pls Ans to Defs Motion to Amend New Matter.pdf Exhibit D - Pls Ans to Defs Motion to Amend New Matter.pdf Exhibit E - Pls Ans to Defs Motion to Amend New Matter.pdf Exhibit F - Pls Ans to Defs Motion to Amend New Matter.pdf Motion CoverSheet Form			
Docket Entry:	28-14102028 ANSWER IN OPPOSITION OF MOTION TO AMEND FILED. (FILED ON BEHALF OF PATRICE KELLY, RONALD KELLY, PATRICE KELLY AND RONALD KELLY)			
07-NOV-2014 11:09 AM	MTASN - MOTION ASSIGNED			07-NOV-2014 11:09 AM
Docket Entry:	28-14102028 MOTION TO AMEND ASSIGNED TO JUDGE: BERNSTEIN, MARK I. ON DATE: NOVEMBER 07, 2014			
07-NOV-2014 11:51 AM	MMUPD - MOTION ASSIGNMENT UPDATED			07-NOV-2014 11:51 AM
Docket Entry:	28-14102028 REASSIGNED TO JUDGE SMITH, GREGORY E ON 07-NOV-14			
07-NOV-2014 05:17 PM	DSCIM - DISCOVERY HEARING REQST FILED	TUCKER, WENDY F		10-NOV-2014 09:03 AM
Documents:	Motion for Sanctions and to Compel Deps.pdf			
Docket Entry:	DISCOVERY HEARING REQUEST FILED IN RE: MOTION FOR SANCTIONS. HEARING SCHEDULED FOR: NOVEMBER 24, 2014 AT 01:00 IN ROOM 246 CITY HALL. (FILED ON BEHALF OF THE CARMAN CORPORATION, THE CARMAN GROUP, INC., THE CARMAN GROUP, LLC AND SERGIUS B CARMAN)			
24-NOV-2014 12:14 PM	CERTI - CERTIFICATION FILED			24-NOV-2014 12:00 AM
Documents:	CERTI_76.pdf			
Docket Entry:	CERTIFICATE PREREQUISITE TO SERVICE OF SUBPOENAS PURSUANT TO RULE 4009.22 FILED.			
01-DEC-2014 08:17 AM	ORDER - ORDER ENTERED/236 NOTICE	BERNSTEIN, MARK I		01-DEC-2014 12:00 AM

	GIVEN			
Documents:	ORDER_77.pdf			
Docket Entry:	AND NOW, THIS 26TH DAY OF NOVEMBER, 2014, UPON CONSIDERATION OF DEFENDANTS, THE CARMEN CORPORATION, THE CARMEN GROUP, INC., THE CARMEN GROUP, LLC, AND SERGIUS B. CARMAN'S MOTION TO COMPEL DEPOSITIONS OF MICHAEL PANSINI, ESQ., AND GREGORY KOWALSKI, ESQ., AND MOTION FOR SANCTIONS FOR FAILURE TO COMPLY WITH THIS COURT'S OCTOBER 21, 2014 ORDERS DENYING MSSRS PANSINI AND KOWASKI'S MOTION TO QUASH SUBPOENA, AND ANY RESPONSE THERETO, IT IS HEREBY ORDERED AND DECREED THAT SAID MOTION IS GRANTED. MICHAEL PANSINI, ESQ., AND GREGORY KOWALSKI, ESQ., ARE HEREBY ORDERED TO APPEAR FOR DEPOSITION.....BY THE COURT: BERNSTEIN,J. 11/26/2014			

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